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**From:** Fried, Gregory [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=960451767A6A44969C7647C875806E38-GFRIED]  
**Sent:** 2/15/2019 6:17:34 PM  
**To:** Phill Brooks (brooks.phillip@epa.gov) [brooks.phillip@epa.gov]; Apple Chapman (chapman.apple@epa.gov) [chapman.apple@epa.gov]  
**Subject:** FW: Tradebe Consent Decree Entered!  
**Attachments:** Tradebe Consent Decree. final entry version. 2-1-19.pdf

Phill/Apple,

Last bit of good news coming out of Region 1..... The Tradebe case was entered on February 1<sup>st</sup>. This is primarily a RCRA Air Rules (Subpart AA, BB, CC) case which will require Tradebe to install RTOs to control excess VOCs from their waste treatment operations at two facilities in Connecticut. If I recall correctly, this case got caught up in the Once In Always In (OIAI) policy changes so the MACT Subpart DD (Off-Site Waste Recovery) violations dropped out. I believe we only had potential emissions violations (no actuals) and the company is taking permit restrictions to be a minor source. Unfortunately, the OIAI policy changes will likely have an adverse impact on our future MACT Subpart DD cases.....we'll see.

WCED was the lead for this case so I suspect they already gave Rosemarie and Patrick a heads-up on the entry of the CD.

Greg

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**From:** Olivier, Tom  
**Sent:** Friday, February 15, 2019 9:11 AM  
**To:** Fried, Gregory <Fried.Gregory@epa.gov>  
**Subject:** FW: Tradebe Consent Decree Entered!

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**From:** Viggiani, Steven  
**Sent:** Wednesday, February 13, 2019 3:44 PM  
**To:** Jouzaitis, Joan <jouzaitis.joan@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Rapp, Steve <Rapp.Steve@epa.gov>; Olivier, Tom <olivier.tom@epa.gov>; Piligian, Richard <piligian.rich@epa.gov>; Papetti, Lisa <papetti.lisa@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; Simpson, Andrea <simpson.andrea@epa.gov>  
**Cc:** Jerison, Joanna <Jerison.Joanna@epa.gov>; Wagner, Michael <wagner.michael@epa.gov>; Chow, James <chow.james@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>  
**Subject:** FW: Tradebe Consent Decree Entered!

Per previous, attached is the final Tradebe consent decree as entered by the court on 2/1/19.

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**From:** Viggiani, Steven  
**Sent:** Wednesday, February 13, 2019 2:23 PM  
**To:** Jouzaitis, Joan <jouzaitis.joan@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Rapp, Steve <Rapp.Steve@epa.gov>; Olivier, Tom <olivier.tom@epa.gov>; Piligian, Richard <piligian.rich@epa.gov>; Papetti, Lisa <papetti.lisa@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; Simpson, Andrea <simpson.andrea@epa.gov>  
**Cc:** Jerison, Joanna <Jerison.Joanna@epa.gov>; Wagner, Michael <wagner.michael@epa.gov>; Chow, James <chow.james@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>  
**Subject:** Tradebe Consent Decree Entered!

Great news – the Tradebe Consent Decree was entered by the district court on February 1, 2019.

Apologies for the announcement delay – the court entered the CD within 24 hours of DOJ's motion requesting entry, so fast that I thought that the docket update was the notice of DOJ's motion!

Tradebe's counsel is aware of the entry – please use February 1<sup>st</sup> as the Entry Date for calculating any compliance action dates under the CD.

Best regards, SV